

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : CHAPTER 13

April L. Anderson : BKY. NO. 19-16929MDC13  
DEBTOR

**MOTION TO MODIFY DEBTOR'S  
CHAPTER 13 PLAN AFTER CONFIRMATION**

1. Debtor filed for protection under Chapter 13 on November 4, 2019.
2. Debtor's amended plan was confirmed on June 2, 2020.
3. Debtor entered into a stipulation to cure post-petition mortgage arrears through the plan.
4. Debtor is amended the plan to comply with the stipulation.
5. Debtor is also extending the plan to 7 years pursuant to the bankruptcy relief provisions of the Cares Act.
6. The significant mortgage arrears were the result of the pandemic and her being furloughed from her job due to the pandemic, then returning part-time and now back to normal hours or salary.
7. Under the modification, payments per month to the trustee only changed from \$477 to \$485 per month.
8. The modified plan is attached as exhibit A.
9. The amended schedule J is attached as exhibit B.

WHEREFORE, Debtor prays that the Motion to Modify Plan be approved.

Respectfully submitted,

Date: November 2, 2020

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